

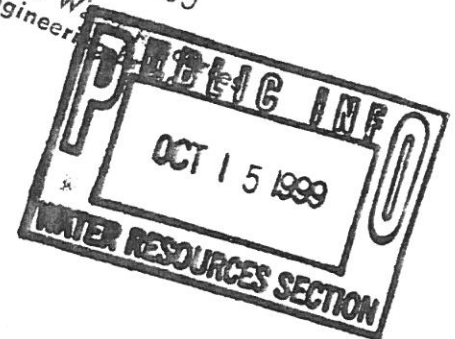


**SPECIAL METALS CORPORATION**

3200 Riverside Drive  
Huntington, WV 25705-1771 USA  
304.526.5100 Fax: 304.526.5643  
www.specialmetals.com

Office of Water  
Engineering

NOV 15 1999



October 13, 1999

Chief, Office of Water Resources, DEP  
ATTN: Jessica Welsh, Public Information Specialist  
1201 Greenbrier Street  
Charleston, WV 25311-1088

RE: Permit Application No. WV0114618  
Compliance Action Plan  
Complete Design Measures

Dear Sir:

Inco Alloys International, Inc. respectfully submits the enclosed engineering drawings that details our compliance plan that was submitted to the state DEP on July 15, 1999. The plan committed Inco Alloys International, Inc. to appropriate capital expenditure for the construction of additional pollution prevention equipment for the grinding building and plasma torch operation. An engineering project for the above purpose has received financial approval of \$280,000 for project cost. The project includes the following items:

1. Re-engineer the grinding building baghouse dust collection systems. There are four separate dust collection units. The scope of this project shall include the replacement of the baghouse hoppers, installation of screw conveyers and implementing the use of super-sacs as a means to totally encapsulate the dust after removal and for transportation purposes.
2. Construct four separate buildings to enclose the grinding building conveyor belts and dust buckets. These enclosure buildings will prevent the dust from becoming airborne and discharged onto the ground.

Item number three from the compliance plan, to seal between the Primary Mill Grinding foundation and the building's sheet metal siding, only requires installing the seal and as a result engineering drawings are not necessary.

Item number four from the compliance plan, to enhance the plasma torch dust collection, only requires switching to the use of a super-sac and as a result engineering drawings are not necessary.

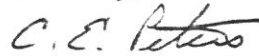
In addition, for information purposes concerning this permit, 100% of the shares of Inco Alloys International, Inc. have been sold to Special Metals Corporation (SMC). While the

copy:  
Dave Chaney  
11-18-99

Corporation is now "a Special Metals company," the Corporation has retained its status as a separate entity and is still registered under the name of Inco Alloys International, Inc. Additionally, the Corporation also has registered to do business under the name Huntington Alloys. Accordingly, at the present time the Corporation is registered as Inco Alloys International, Inc. d/b/a Huntington Alloys.

If you have any questions regarding this matter please contact me at (304) 526-5688.

Sincerely,

A handwritten signature in dark ink, appearing to read "C. E. Peters". The signature is fluid and cursive, with the first letters of each word being capitalized and prominent.

C. E. Peters  
Safety, Health &  
Environmental Engineer